

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JOSE ORLANDO GOMEZ APONTE

DEBTOR

CASE NO 18-01896 ESL

CHAPTER 13

DEBTOR'S REPLY TO MOTION OBJECTING THE CONFIRMATION OF THE PLAN
DOCKET NO. 12

TO THE HONORABLE COURT:

COMES NOW, JOSE ORLANDO GOMEZ APONTE, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. First Bank Puerto Rico filed a Motion Objecting the Confirmation of the Plan, Docket No. 12, objecting the confirmation of Debtor's proposed Amended Chapter 13 Plan (Docket No. 11), requesting concurrent equal monthly payments with attorney fees in the amount of \$50.00.

2. The Debtor respectfully states that the Debtor's Amended Chapter 13 Plan, dated June 07, 2018 (Docket No. 11), on Section 3.6 *Pre-conformation adequate protection monthly payments ("APMP") to be paid by the trustee* provides a \$75.00 amount to be paid to First Bank Puerto Rico.

3. The Debtor hereby respectfully responds to First Bank's objection to Plan confirmation, Docket No. 12, in the above captioned case.

WHEREFORE, the Debtor respectfully prays that First Bank's objection to Plan confirmation Docket No. 12, be denied and the Debtor's proposed Amended Chapter 13 Plan, dated June 07, 2018, Docket No. 11, be confirmed.

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by

United States Postal Service copy of this motion to the following CM/ECF non-participant:

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Reply to Trustee's Unfavorable Report
Case no. 18-01896 ESL13

the Debtor, Jose Orlando Gomez Aponte, 4828 Roosevelt Boulevard Philadelphia PA 19124, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 13th day of June, 2018.

/s/ Roberto Figueroa Carrasquillo

USDC #203614

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